

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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SCANSOFT, INC.,	)
	)
	)
Plaintiff,	)
	)
v.	) C.A. No. 04-10353-PBS
	)
	)
VOICE SIGNAL TECHNOLOGIES, INC.,	)
LAURENCE S. GILLICK, ROBERT S.	)
ROTH, JONATHAN P. YAMRON, and	)
MANFRED G. GRABHERR,	)
	)
Defendants.	)
	)

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**AFFIDAVIT OF MANFRED G. GRABHERR**

I, Manfred G. Grabherr, on oath, depose and say as follows:

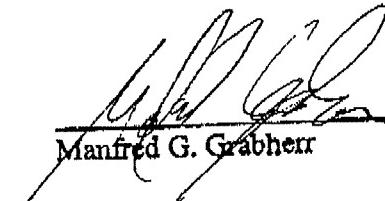
1. I currently am employed by the Broad Institute of Massachusetts Institute of Technology as a computational biologist. I was formerly employed by Voice Signal Technologies, Inc. ("Voice Signal"), and I am a defendant in the above captioned lawsuit. I make this affidavit in connection with Voice Signal Technology Inc.'s Memorandum in Support of its Objections to the Magistrate Judge's Order Regarding Trade Secrets.

2. I joined Voice Signal as an employee on or about October, 2000. Prior to joining Voice Signal, I was employed by Iconverse.com. Before my employment with Iconverse.com, I was employed by Learnout & Hauspie Speech Products, N.V. ("L&H").

3. I never worked for Dragon Systems, Inc. During my employment at L&H, I was never given access to the source code or development documents for a product known as Dragon Naturally Speaking, nor did I perform any work related to that product. I have no idea whether

there are trade secrets in the Dragon Naturally Speaking source code, and if there are, what they are.

Signed under the pains and penalties of perjury this 12 day of April, 2005.

  
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Manfred G. Grabher